



Warsaw, 26 January 2024

Green REV Institute's response to TRIS Notification 2023/0675/IT

Green REV Institute welcomes the possibility to submit the position on Italy's new law *Provisions relating to the prohibition on the production and marketing of food and feed consisting of, isolated from or produced from cell cultures or tissues derived from vertebrate animals, as well as the prohibition on the designation of processed products containing vegetable proteins as meat.*

We would like to highlight the following key points with regard to Italy's new law regarding plan based alternatives to animal products:

- a. The Charter of Fundamental Rights of the European Union, clearly outlined in Article 38, emphasises the consumer's right to information and health. Products that currently replace meat from animals, according to all studies, are healthier than animal meat. Therefore, it is crucial that the nomenclature for meat substitutes is not censored as it indicates the function of the product. When we consume sandwiches with ham, consumers have the right to purchase a product in the store that replaces animal ham, and is named in a way that reflects the purpose of the product. Censoring nomenclature is a restriction on consumers' right to information about a product, its potential uses, and applications.
- b. The right to healthy food. Dr Chris Bryant from the Department of Psychology: “Increasingly we’re seeing how plant-based products are able to shift demand away from animal products by appealing to three essential elements consumers want: taste, price and convenience.”



This review demonstrates overwhelming evidence that, as well as being far more sustainable compared to animal products in terms of greenhouse gas emissions, water use and land use, **plant-based animal product alternatives also have a wide range of health benefits.** (2022, <https://www.sciencedirect.com/science/article/pii/S2666833522000612#bib0085>). We want to emphasise that censoring nomenclature contradicts scientific knowledge regarding the benefits of consuming plant-based products and replacing animal products with vegan alternatives. As consumers, we want and have the right to prioritise our health, and censorship of substitutes supports the interests of a narrow meat lobby. Decision-makers must prioritise the well-being of citizens and public health above all.

c. [Recent surveys](#) indicate that consumers distinguish between plant-based burgers and meat burgers correctly. They are not confused by plant-based products labelled with meat-sounding names such as ‘nuggets’ or ‘burgers’. The overwhelming majority, 96.4% of respondents, said they had chosen the product consciously. More than 80% thought it was obvious that the product did not contain meat as long as it was labelled ‘vegan’, ‘vegetarian’ or plant-based’.

d. The Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004, states clearly that: “The free movement of safe and wholesome food is an essential aspect of the internal market and contributes significantly to the health and well-being of citizens, and to their social and economic interests.” As we mentioned and highland the plant based meat is a healthier option than animal products. Plant-based meat is also free from preservatives including nitrites and nitrates, both of which have been linked to an increased risk of certain types of cancer. Processed meat containing nitrates and nitrites was declared a human carcinogen



by the World Health Organization in 2015. Plant-based meat may also help to reduce the spread of antibiotic-resistant bacteria. According to the Good Food Institute, 70 percent of the U.S. supply of medically important antibiotics is used for animal agriculture. This not only reduces access for humans but also increases the prevalence of antibiotic-resistant bacteria—a leading cause of infections and cause of more than 35,000 U.S. deaths per year.

e. The Regulation states also that: “The general public has an interest in the relationship between diet and health and in the choice of an appropriate diet to suit individual needs. The Commission White Paper of 30 May 2007 on a Strategy for Europe on Nutrition, Overweight and Obesity related health issues (the ‘Commission White Paper’) noted that nutrition labelling is one important method of informing consumers about the composition of foods and of helping them to make an informed choice. The Commission Communication of 13 March 2007 entitled ‘EU Consumer Policy strategy 2007-2013 — Empowering consumers, enhancing their welfare, effectively protecting them’ underlined that allowing consumers to make an informed choice is essential both to effective competition and consumer welfare. Knowledge of the basic principles of nutrition and appropriate nutrition information on foods would contribute significantly towards enabling the consumer to make such an informed choice. Education and information campaigns are an important mechanism for improving consumer understanding of food information.” Therefore, we cannot censor plant-based food, relegating it to a niche, but instead, we must strive to facilitate the transition to plant-based diets. This aligns with the ambitions of the EU's Farm to Fork strategy and addresses the current health crisis associated with unhealthy food.

f. The report [“What’s cooking” \(2023, UNEP\)](#), shows that:

- “Animal source foods significantly impact the environment, human health, socioeconomic dynamics and animal welfare;
- As global demand for meat and dairy products continues to rise, their production and consumption pose significant challenges for public health and animal welfare. Eating too much red and processed meat contributes to high rates of obesity and diabetes. Animal agriculture raises the risk of new zoonotic diseases and



antimicrobial resistance. Many animals are raised and slaughtered in conditions that undermine their welfare. It is clear that food systems, including the meat and dairy sector, must be part of the social and economic transformations required to halt and reverse the damage we are inflicting on Earth's natural systems. Achieving the Sustainable Development Goals, limiting global warming under the Paris Agreement and fulfilling the Kunming-Montreal Global Biodiversity Framework all depend on it;

- **Policymakers have a particular responsibility for ensuring that any such transitions are socially fair and well managed, and do not undermine food security or result in a more inequitable world for social minorities, including women and Indigenous Peoples.”**

According to the report authors, novel plant-based meat demonstrates potential for lower environmental impacts compared to many conventional animal source foods (ASF). They also hold promise for reducing the risk of zoonoses and antimicrobial resistance while significantly addressing animal welfare concerns associated with traditional animal agriculture. We cannot ignore the voice of the United Nations, specifically the UN Environmental Programme, in favour of the meat lobby's interests. The meat lobby often defends its core business regardless of the well-being of people, the planet, and the costs to public health.

We would like to underline that current labelling needs to be reformed and changed. According to [Safe and Just. Plant Based Treaty \(2023\)](#):

“Proper food labelling not only educates consumers on the environmental implications of their choices but also directly impacts public health. Informing consumers about potential health risks associated with certain products allows them to make informed dietary choices, potentially reducing the burden on healthcare systems. Researchers from Durham University added warning labels to meat products to measure how it impacted purchasing choices. Meat that carried a poor health warning with an image of a heart attack reduced choice by 8.8 per cent; a climate change



warning featuring an image of deforestation decreased selection by 7.4 per cent; and a pandemic warning featuring an exotic meat image led to a 10 per cent drop in selection (Hughes et al., 2023). Businesses could voluntarily introduce company and industry wide carbon and environmental labelling. The UK's Behavioural Insights Team recommends introducing ecolabels on products, and on firms (The behavioural insights team, 2023). They recommend creating “a simple system of ecolabels across key product sectors (food, clothing, pensions) and businesses (supermarkets, banks, airlines, retail chains) to help engaged consumers choose green. By extension, this incentivises businesses to become more sustainable, helping everyone buy greener products and services.” Schools, hospitals, universities, care homes, prisons and other institutions could also introduce environmental labelling. The UK's Behavioural Insights Team (2023), found that an overwhelming 83 per cent of the British populace supports the introduction of easy-to-understand eco-labels across various product sectors and businesses to facilitate greener consumer choices. Such credible ecolabeling can also act as a deterrent against “greenwashing”. Even though labelling might have a marginal influence on immediate consumer behaviour, a slight shift in demand can jeopardise market share for non-compliant businesses, incentivising better environmental performance. Honest labelling is directed to consumer goods manufacturers and food producers. We also need full transparency from every link in the supply chain regarding emissions, deforestation, human rights abuses, funding, and resource extraction. Due diligence from corporations requires that they investigate, audit and report on the impact on the biosphere and social boundaries and then label accordingly.”

The current decision regarding Italian law will either be a step forward in protecting consumer rights, promoting plant-based food, and meeting the expectations of the majority of consumers, or it will be a step backward in the transformation of the food system, surrendering ground to the meat lobby through the censorship of nomenclature. A just transition of the food system will involve many decisions that may be uncomfortable for businesses that are not sustainable. However, it is time for these decisions to be made. We hope for a just, transparent resolution based on scientific facts rather than business demands.

